

1 SCOTT G. LAWSON (SBN 174671)
2 JASON B. CUNNINGHAM (SBN 261559)
3 GREENBERG TRAURIG, LLP
153 Townsend Street, 8th Fl.
San Francisco, CA 94107
Telephone: (415) 655-1300
4 Facsimile: (415) 707-2010
lawsons@gtlaw.com

5 Attorneys for Defendant,
6 MORTGAGEIT, INC.
7

8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **OAKLAND DIVISION**
11

12 MAYDA SANCHEZ,

13 Plaintiffs,

14 v.

15 MORTGAGEIT, INC.; MORTGAGE
16 ELECTRONIC REGISTRATION SYSTEMS,
INC.; WELLS FARGO BANK NA dba
17 AMERICAS SERVICING COMPANY; CAL-
WESTERN RECONVEYANCE
18 CORPORATION; FEDERAL HOME LOAN
MORTGAGE CORPORATION; and DOES 1-
19 100, inclusive,

20 Defendants.
21

CASE NO.: 4:10-CV-04146-PJH

**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE INITIAL CASE
MANAGEMENT CONFERENCE**

Date: January 20, 2011
Time: 2:00 p.m.
Courtroom: 3, 3rd Floor
Hon. Judge Phyllis J. Hamilton

22 IT IS HEREBY STIPULATED, by and between plaintiff Mayda Sanchez and
23 defendants MortgageIT, Inc., Wells Fargo Bank NA, and Federal Home Loan Mortgage
24 Corporation, and subject to this Court's approval, as follows:

25 WHEREAS, the current Case Management Conference is scheduled for January 20,
26 2011 at 2:00 p.m. in the above-captioned Court;

27 WHEREAS, on December 1, 2010, this Court heard argument concerning motions to
28 dismiss brought by MortgageIT, Inc., Wells Fargo Bank NA, and Federal Home Loan

1 Mortgage Corporation and plaintiff Mayda Sanchez's objection to the motion to
2 dismiss along with her proposal of filing a first amendment complaint and took those
3 matters under submission;

4 WHEREAS, an order on the motions to dismiss has yet to be issued;

5 WHEREAS, the parties agree that it would be appropriate to continue the Case
6 Management Conference until a date after the Court issues its order on the motions to
7 dismiss and the pleadings in this matter are more firmly settled, and further agree that
8 such a continuance will make the case management process more efficient; and

9 All parties to this action HEREBY STIPULATE that the Case Management Conference
10 currently scheduled for January 20, 2011 at 2:00 p.m. shall be rescheduled to March 10, 2011 at
11 2:00 p.m. in courtroom 2, 3rd floor, of the above captioned court, or to such other date and time
12 as the Court deems appropriate.

13
14 DATED: January 10, 2011

MAYDA SANCHEZ

15
16 By /s/ Mayda Sanchez
17 Mayda Sanchez
18 Plaintiff Pro Per

19
20 DATED: January 10, 2011

GREENBERG TRAURIG, LLP

21 By /s/ Jason B. Cunningham
22 Scott G. Lawson
23 Jason B. Cunningham
24 Attorneys for Defendant
25 MORTGAGEIT, INC.

26
27 DATED: January 10, 2011

SEVERSON & WERSON

28 By /s/ Raymond H. Cho
Raymond Hyun Cho
Attorney for Defendant
WELLS FARGO BANK NA

1 DATED: January 10, 2011

PITE DUNCAN

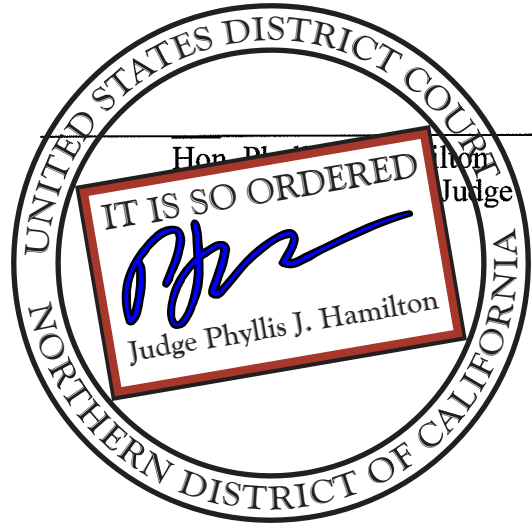
2
3 By /s/ Thomas N. Abbott
4 Thomas Nathaniel Abbott
5 Attorneys for Defendant
6 FEDERAL HOME LOAN MORTGAGE
CORPORATION

7 I hereby attest that I have permission from counsel and from Ms. Sanchez for any signatures
8 indicated by a "conformed" signature (/S/) within this e-filed document.

9 /s/ Jason B. Cunningham

10
11 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

12
13 Dated: 1/14/11



DECLARATION OF SERVICE

I am a citizen of the United States, over the age of 18 years, and not a party to or interested in this action. I am employed in the County of Sacramento, State of California and my business address is Greenberg Traurig, LLP, 153 Townsend Street, Eighth Floor, San Francisco, CA 95814. On this day I caused to be served the following document(s):

STIPULATION AND [PROPOSED] ORDER TO CONTINUE INITIAL CASE MANAGEMENT CONFERENCE

☒ by placing ☐ the original ☒ a true copy into sealed envelopes addressed and served as follows:

Mayda Sanchez
2246 Santa Maria Drive
Pittsburg, California 94565

Pro Per Plaintiff

☒ **BY MAIL:** I am familiar with this firm's practice whereby the mail, after being placed in a designated area, is given fully prepaid postage and is then deposited with the U.S. Postal Service at San Francisco, California.

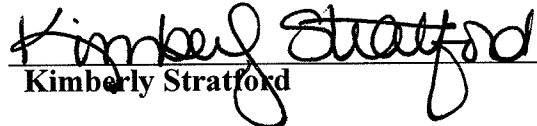
☐ **BY PERSONAL SERVICE:** I caused such envelope to be delivered by hand.

☐ **BY OVERNIGHT COURIER:** I caused such envelope to be placed for collection and delivery in accordance with standard overnight delivery procedures for delivery the next business day.

☐ **BY FACSIMILE:** I caused such document(s) to be transmitted by facsimile transmission to the person(s) and facsimile transmission number(s) shown above. The facsimile transmission was reported as complete without error and a transmission report was properly issued by the transmitting facsimile machine. A true and correct copy of the transmission report will be attached to this proof of service after facsimile service is completed.

I declare under penalty of perjury under the laws of the United State that the foregoing is true and correct.

Executed on *January 10, 2011*, at San Francisco, California.


Kimberly Stratford